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**The United States District Court  
Southern District of Indiana  
Indianapolis Division**

**FILED**

**3:25 pm, Sep 01, 2020**

**U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk**

TERRY R. BAYLOR

Vs.

Civil Action # 3:20-cv-204-RLY-MPB

Pension Benefit Guaranty Corp.  
(Successor Trustee of Oxford Automotive)

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**USC-1983 CIVIL RIGHTS COMPLAINT**

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**PARTIES**

The Plaintiff Terry R. Baylor pro-se is a resident of the State of Indiana and a natural born citizen of the United States who currently resides at the Branchville Correctional Facility locate 21390 Old State Road #37 Branchville Indiana 47514

The Defendant is Pension Benefit Guaranty Corp. (*Successor Trustee of Oxford Automotive*) a corporate entity who represents its self to operate under the Color of Federal Law and Federal Statutory Authority resides at; 1200 K Street N.W Washington D.C. The Plaintiff believes this court to be the proper jurisdiction and forum to bring and litigate his Claim and complaint. The Plaintiff in support of his complaint states the following:

## **Jurisdiction**

Civil Complaint pursuant to 42- USC-1983 and  
Employee Retirement Income Security Act 29 USC 1109

## **Cause of Action**

The Defendants have and are currently withhold money owed to the Plaintiff as part of a retirement plan; doing so knowingly and with deliberate indifference; the defendants have intentionally disregarded the Plaintiff's demands for payments owed to him and therefore denied the Plaintiff of Due Process of Law

## **Statement of Case**

The Plaintiff is 60 years old, retired and entitled to payments from the defendant as part of a Retirement plan. The Plaintiff labored hard and consistently for the employer formally known as Oxford Automotive formerly located in Southern Indiana. The Plaintiff labor for a period of 16 years, and unfortunately like many Americans following the economic downturn that resulted from the housing bubble collapse, the Plaintiff was forced from his job, and then confronted with devastating fact that his pension and retirement plan that he had worked so many years toward had almost all but disappeared before his eyes, and that he would only receive a meager payment of 126.00 a month Once he reached the age 60 years old. The Plaintiff is now 60 years old and Defendants refuse to pay out on said retirement plan.

### **Exhaustion of Remedies**

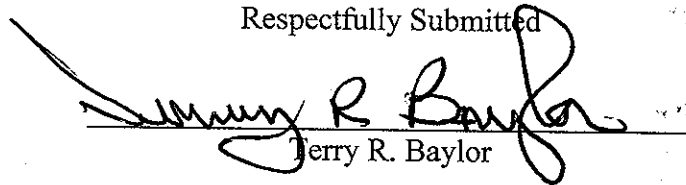
The Plaintiff has exhausted all known remedies made numerous Letters and has numerous emails sent to the Defendant who refuses to respond, and therefore depriving the Plaintiff of what is rightfully and legally his.

### **Settlement Sought**

The Plaintiff is suffering at the deprivation of the Defendants and seeks redress of his Complaint and grievance, and the defendants to simply make good on any delinquent, past due Payments and start paying out as they are required.

**Wherefore** the Plaintiff respectfully wishes the court to set this matter for litigation and on a course toward resolution.

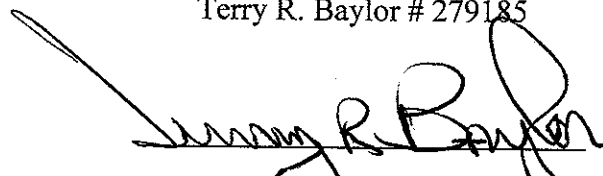
Respectfully Submitted



Terry R. Baylor

I Terry Baylor swear and affirm that the representations made are true and accurate to the best of my knowledge and ability and that a true and accurate copy of this complaint has been filed upon the defendants.

Terry R. Baylor # 279185



Branchville Correctional Facility  
21390 Old State Road #37  
Branchville Indiana 47514